

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC ALLEGED FAILURE OF)	
FARMDALE WATER DISTRICT, AND ITS)	
INDIVIDUAL COMMISSIONERS SCOTTIE)	CASE NO.
WOOLRIDGE, JON DAILEY, AND EDDIE)	2022-00347
HARROD TO COMPLY WITH KRS 278.030, 807)	
KAR 5:006, SECTION 4(4), 807 KAR 5:006,)	
SECTION 26 AND 807 KAR 5:066)	

COMMISSION STAFF'S SECOND POST-HEARING REQUEST FOR INFORMATION
TO FARMDALE WATER DISTRICT

Farmdale Water District (Farmdale District), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on May 17, 2024. The Commission directs Farmdale District to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and shall include the name of the witness responsible for responding to the questions related to the information provided. Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Farmdale District shall make timely amendment to any prior response if Farmdale District obtains information that indicates the response was incorrect or incomplete when made or, though correct or complete when made, is now incorrect or incomplete in any material respect.

For any request to which Farmdale District fails or refuses to furnish all or part of the requested information, Farmdale District shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied and scanned material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, Farmdale District shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to Farmdale District's Qualified Infrastructure Improvement Plan (QIIP).

- a. Identify all projects Farmdale District or HMB Engineering (HMB) believe are necessary to reduce unaccounted-for water loss below 15 percent other than projects identified in the QIIP.

b. Provide estimated costs for each project identified in the response to Item 1a above.

2. Refer to Case No. 2019-00041, final Order,² pages 6–7, paragraphs 1 through 4.

a. Provide any evidence, including documentary evidence, that Farmdale District has “developed a plan to improve the operations and financial health of the utility” pursuant to paragraph 1.

b. Provide an updated plan for improving the operations and financial health of Farmdale District.

c. Explain why Farmdale District has not developed a plan for addressing operating losses and funding all necessary water loss reduction projects.

d. Provide any evidence, including documentary evidence, that Farmdale District has implemented “policies and procedures used to address water loss and better business practices, including but not limited to a water loss reduction plan, a leak detection plan, and employee policies and procedures” pursuant to paragraph 2.

e. Provide an updated plan for improving business practices.

f. Provide a copy of Farmdale District’s water leak detection and water loss prevention manuals. If the manuals do not address valves, zone meters, tank meters, typical demand for each area, and number of personnel and time required to carry out these tasks, explain why.

² Case No. 2019-00041, *Investigation into Excessive Water Loss by Kentucky's Jurisdictional Water Utilities* (Ky. PSC July 30, 2021), Order at 6–7.

3. Refer to Case No. 2020-00217, opening Order,³ pages 3–4, paragraphs 3 and 11.

a. Explain why Farmdale District's QIIP was not filed until February 29, 2024, when it was due February 22, 2023, per the Commission's third Order granting an extension.⁴

b. Explain why Farmdale District's QIIP does not provide a time schedule as required by paragraph 3.

c. Provide a timeline for eliminating each source of unaccounted-for water loss.

d. Explain why Farmdale District did not file an annual progress report per paragraph 11 for 2023.

4. Refer to Case No. 2019-00041, final Order, pages 5–6, paragraphs 2 through 4.

a. State whether Farmdale District has installed isolation valves in distribution systems, bypass meters, or dedicated meter pits for use with a portable flowmeter to help isolate leaks into lateral lines. If not, explain why not.

b. State whether installing this equipment is part of Farmdale District's water loss reduction plan. If not, explain why not.

c. State whether Farmdale District has sufficient personnel available for leak detection and other water loss reduction tasks. If not, explain why not.

³ Case No. 2020-00217, *Electronic Farmdale Water District's Unaccounted-for Water Loss Reduction Plan, Surcharge and Monitoring* (Ky. PSC July 7, 2020), Order at 3–4.

⁴ Case No. 2020-00217, Feb. 10, 2023 Order.

5. Refer to Case No. 2019-00041, Farmdale Water District's Progress Report (filed May 20, 2020), paragraph 2.

a. Indicate which tasks listed in subparagraphs (a) through (g) have been completed and the corresponding date of completion.

b. If any of these tasks have not been completed, explain why.

c. Provide estimated costs for each incomplete task.

6. Refer to Farmdale District's response to Commission Staff's First Post-Hearing Request for Information, Item 2. Provide any documents reviewed by or provided to Commissioners prior to or as a result of each commissioner meeting date provided in the response.

 FDL

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Public Service Commission
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DATED APR 24 2024

cc: Parties of Record

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